

Serial No. 09/810,795  
21 February 2004 Reply to  
26 November 2003 Office Action

### **REMARKS**

Claims 1-3 and 5-10 are pending in the present application. All of these claims stand rejected under 35 U.S.C. 103(a).

Applicants respectfully request reconsideration and allowance of the above-identified application in view of the following remarks.

#### **35 U.S.C. 103(a):**

Applicants respectfully disagree with the present rejection. The combination of Tseng/Lin et al. and Hirose does not achieve the claimed invention, and proper motivation does not exist for combining Tseng/Lin et al. and Hirose.

First, the combination of Tseng/Lin et al. and Hirose does not achieve the claimed invention. The examiner's position appears to be that it would be obvious to combine the teachings of Tseng/Lin et al. on illumination of laptops with the digital camera of Hirose to arrive at the claimed invention, which includes, among other things, the illumination of objects of a laptop digital camera. However, Applicants respectfully submit that this combination, even if motivation to combine was proper (which Applicants submit below does not exist), does not arrive at the claimed invention. As indicated by the examiner, Tseng/Lin et al. teach portable lamp assemblies attachable to a laptop for lighting the laptop in darkening conditions. These portable lamp assemblies, especially Lin et al., are used to illuminate the keys of the laptop so that an inexperienced typist can view the keys while typing (See Lin et al., col. 1, lines 43-52). Hirose teaches a laptop digital camera for obtaining digital images of objects (e.g., the user) of the digital camera, not obtaining images of the keys of a laptop computer nor obtaining images of any other part of the laptop computer. If the Examiner is suggesting that the laptop is an object of the digital camera in Hirose, Applicants respectfully disagree because the digital camera of Hirose is part of the laptop and is clearly obtaining digital images of the laptop user, not the laptop. Further, none of these references teach a combination digital camera and light integrated with one another and drawing power from the same power source, the light of the

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combination digital camera and light including at least one LED. Accordingly, the combination of these references does not achieve the claimed invention.

Second, proper motivation does not exist to combine the references in the manner suggested. Although Tseng/Lin et al. discuss illumination of a laptop computer, they have nothing to do with a method of illuminating one or more objects of a combination digital camera and light associated with a laptop computer because these references have nothing to do with a laptop digital camera nor illumination of objects (e.g., the user) of a laptop digital camera. Hirose has nothing to do with a method of illuminating one or more objects of a combination digital camera and light associated with a laptop computer because this reference has nothing to do with lighting of objects of digital cameras. Because Tseng/Lin et al. and Hirose are complete in themselves, none of these references disclose, teach, nor suggest the proposed combination, and these references address completely different problems, proper motivation does not exist to combine these references.

Therefore, the claimed invention should be in condition for allowance and such action is respectfully requested.

Because dependent claims 2, 3 and 5-10 add further limitations to claim 1, these claims are further not disclosed, taught, or suggested by the references. Further, as discussed in the prior response, Claim 10 is especially not disclosed, taught, or suggested by the cited prior art because these references show separate lights and a separate camera, not the combination digital camera and light integrated with the laptop computer.

#### Revocation and New Power of Attorney

The Examiner is requested to note that a revocation and new power of attorney was filed on January 16, 2002 (copy enclosed), and that correspondence should be sent to the address indicated therein.

Serial No. 09/810,795  
21 February 2004 Reply to  
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**CONCLUSION**

On the basis of the above, early allowance of the application is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments regarding this amendment, a telephone call to the undersigned at the number listed below is respectfully urged.

Respectfully submitted,

PROCOPIO, CORY, HARGREAVES  
& SAVITCH, LLP



By: \_\_\_\_\_

Stephen C. Beuerle  
Reg. No. 38,380

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Procopio, Cory, Hargreaves & Savitch LLP  
530 B Street, Suite 2100  
San Diego, California 92101-4469  
(619) 238-1900